

COMMONWEALTH OF MASSACHUSETTS
Department of Telecommunications and Energy

**RESPONSE OF THE ATTORNEY GENERAL TO THE
SECOND SET OF INFORMATION REQUESTS FROM THE
BAY STATE GAS COMPANY
DTE 05-27**

Dated: August 2, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-16 Please provide all notes, workpapers, spreadsheets, calculations or reports used, prepared or relied on by Mr. Cavallo in preparing his testimony, whether created by Mr. Cavallo or anyone else.

Response: In preparing his prefiled testimony, Mr. Cavallo reviewed numerous discovery documents produced to the Attorney General's office in this matter as well as the prefiled testimony of Mr. Cote as it related to the steel replacement program. These materials are already part of the record in this proceeding and in the possession of the Company. Mr. Cavallo spoke to Mr. Timothy Leary, a repair crew employee at Bay State Gas Company concerning his field experience, observations and practices, and the notes concerning his conversation are attached to the response to BSG-AG-2-22. Mr. Cavallo visited two excavation sites, and notes of this field visit are already contained in his prefiled testimony.